



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

May 10, 2019

Evandro C. Gigante
Member of the Firm
d +1.212.969.3132
f 212.969.2900
egigante@proskauer.com
www.proskauer.com

By eFile

Honorable Robert W. Lehrburger
United States Magistrate Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Susan Forte v. Columbia University, et al*
Civil Action No. 18-cv-08923

Dear Mag. Judge Lehrburger:

Pursuant to the Court's Scheduling Order (Dkt. No. 25), Plaintiff Susan Forte and Defendant The Trustees of Columbia University in the City of New York (incorrectly named as "Columbia University") (collectively, the "Parties") submit this joint status letter.

Since the March 11, 2019 case management conference with the Court, the parties have exchanged initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1), and Defendant has propounded initial interrogatories and requests for production of documents upon Plaintiff.

Counsel for Defendant has also provided counsel for Plaintiff with the following two proposed stipulations for their consideration:

1. Stipulation of Dismissal pursuant to which Plaintiff would agree to file an amended complaint to correctly name Defendant as "The Trustees of Columbia University in the City of New York" and to dismiss Plaintiff's claims against improperly named entities Columbia University Medical Center and Columbia University Center for Women's Reproductive Care; and
2. Stipulation and [Proposed] Order Regarding Confidential Information.

Counsel for the Parties are working to finalize their language before filing.

Plaintiff's counsel represents that they are finalizing their initial demands, and they intend to serve same before the end of today. The Parties' counsel are thus far cooperating with moving the case along, and there are no discovery related (or other) issues which require court intervention at this time.



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Respectfully submitted,

BAILEY LAW P.C.

By: /s/ Anthony V. Gentile
Edward G. Bailey
Anthony V. Gentile (of counsel)

and co-counsel

THE HARMAN FIRM, LLP

Walker G. Harman
Edgar M. Rivera

Attorneys for Plaintiff

PROSKAUER ROSE, LLP

By: /s/ Evandro C. Gigante
Evandro C. Gigante
Margaret F. Swetman (*pro hac vice pending*)

Attorneys for Defendant